

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Argo Global Special Situations
Fund, et al.,

File No. 10-cv-03614 JNE/SRN

Plaintiffs,

v.

Wells Fargo Bank, National
Association, as Indenture Trustee;
Tristan Oil, Ltd., a British Virgin
Islands Company; GLG Atlas
Macro Fund; Renaissance
Securities (Cyprus) Limited;
Vision Advisors III Limited; and
Sputnik Group Ltd.,

**NOTICE OF MOTION
OF DEFENDANT TRISTAN OIL, LTD.
TO DISMISS PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 12(B)(1),
(2), (6), AND (7) AND ON GROUNDS OF
FORUM NON CONVENIENS, OR TO
ABSTAIN**

Defendants.

To: Plaintiffs and their attorneys Michael M. Krauss, Faegre & Benson, LLP, 90 S 7th Street,
Suite 2200, Minneapolis, MN 55402.

PLEASE TAKE NOTICE that the motion of Defendant Tristan Oil, Ltd. to dismiss
pursuant to Federal Rule of Civil Procedure 12(b)(1), (2), (6), and (7) and on grounds of *forum
non conveniens*, or to abstain will be heard before The Honorable Joan N. Ericksen, at the United
States Courthouse, Courtroom 12W, 300 South Fourth Street, Minneapolis, Minnesota on
January 13, 2011 at 2:00 p.m.

Anthony D. Ullman (pro hac vice admission pending)
Salans LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020-2457
(212) 632-5500

and

Dated: October 22, 2010

s/Jon S. Swierzewski

Jon S. Swierzewski (108017)
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Attorneys for Defendant Tristan Oil, Ltd.

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